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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TIMOTHY MELLON, a Wyoming) Cause No.: 13-CV-118-SWS
resident,)

Plaintiff,)

vs.)

THE INTERNATIONAL GROUP FOR)
HISTORIC AIRCRAFT RECOVERY,)
a Delaware non-profit corporation and)
RICHARD E. GILLESPIE,)

Defendants.)

**PLAINTIFF'S DESIGNATION
OF EXPERT WITNESSES**

Pursuant to this Court's October 10, 2013 order and U.S.D.C.L.R. 26.1,

Plaintiff Timothy Mellon discloses the following expert witnesses:

(1) John D. Jarrell, PhD, PE.

(A) Written report: See attached Exhibit A and Exhibit B. High definition digital photographs and images are also available for production upon request. Dr. Jarrell will also utilize original film and images in possession of Defendants.

(B) Field of Expertise: As described in his resume, Materials Science and Mechanical Engineer, Doctor of Medical Science and Biology.

(C) Qualifications: See attached Exhibit C.

(D) Designation of Opinion and Methodology: See attached Exhibit A (with attachments), Methods, paragraph 1, Conclusions, paragraphs 2, 3 and 5-9. See also attached Exhibit B (with attachments).

(E) Publication and Deposition Testimony: See attached Exhibit C. Dr. Jarrell's resume includes a listing of the publications he has authored and cases that he has served as an expert in during the past 4 years.

(F) Fees: Dr. Jarrell's rate for deposition testimony is \$650.00 per hour (retainer, Min. 6 hours billed, in advance). Dr. Jarrell's rate for study and testimony is \$495.00 per hour.

(2) Prof. Graham Forrester, PhD.

(A) Written report: See attached Exhibit A. High definition digital

photographs and images are also available for production upon request. Dr.

Forrester will also utilize original film and images in possession of Defendants.

(B) Field of Expertise: As described in his resume, Aquatic Ecologist.

(C) Qualifications: See attached Exhibit D.

(D) Designation of Opinion and Methodology: See attached Exhibit A (with attachments), Methods, paragraph 2, Conclusions, paragraphs 1, 3a, and 4.

(E) Publication and Deposition Testimony: See attached Exhibit D. Dr. Forrester's resume includes a listing of the publications he has authored in the last 10 years. Dr. Forrester has not testified as an expert at trial or by deposition within the preceding four years.

(F) Fees: For deposition testimony, Dr. Forrester charges \$300.00 per hour plus any travel expenses incurred. Dr. Forrester's rate for study and testimony is \$300.00 per hour.

(3) Jay M. Vincelli, M.Sc.

(A) Written report: See attached Exhibit E. High definition digital photographs and images are also available for production upon request. Mr. Vincelli will also utilize original film and images in possession of Defendants.

(B) Field of Expertise: As described in his resume, 3D imagery.

(C) Qualifications: See attached Exhibit F.

(D) Designation of Opinion and Methodology: See attached Exhibit E (with attachments).

(E) Publication and Deposition Testimony: See attached Exhibit F. Mr. Vincelli has not testified as an expert at trial or by deposition within the proceeding four years.

(F) Fees: Mr. Vincelli's rate for deposition testimony is \$500.00 per hour (retainer, Min. 4 hours billed, in advance). Mr. Vincelli's rate for study and testimony is \$365.00 per hour.

(4) Fatih Calakli

(A) Written report: See attached Exhibit G. High definition digital photographs and images are also available for production upon request. Mr. Calakli will also utilize original film and images in possession of Defendants.

(B) Field of Expertise: As described in his resume, Computer Vision Research Science and Software Engineering.

(C) Qualifications: See attached Exhibit H.

(D) Designation of Opinion and Methodology: See attached Exhibit G (with attachments).

(E) Publication and Deposition Testimony: See attached Exhibit H. Mr. Calakli has not testified as an expert at trial or by deposition within the proceeding

four years.

(F) Fees: Mr. Calakli's rate for deposition testimony is \$500.00 per hour (retainer, Min. 4 hours billed, in advance). Mr. Calakli's rate for study and testimony is \$495.00 per hour.

(5) Any expert disclosed by Defendants.

(6) Any expert needed for rebuttal, impeachment or foundation.

DATED this 28th day of February, 2014.

CROWLEY FLECK PLLP

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